

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A.
ARIAS HOLDINGS,
LLC, AMERICAN INCOME
LIFE INSURANCE COMPANY,

ELECTRONICALLY FILED

Defendant.

JURY TRIAL DEMANDED

**PLAINTIFF’S RESPONSE TO DEFENDANT AMERICAN INCOME LIFE
INSURANCE COMPANY’S MOTION TO COMPEL ARBITRATION AND STAY THE
CASE AND REMAINING DEFENDANTS’ JOINDERS TO SAME**

Plaintiff, Renee Zinsky (“Plaintiff”), by and through her undersigned counsel, files this Response to American Income Life Insurance Company’s (“Defendant” or “AIL”) Motion to Compel Arbitration and Stay the Case and remaining Defendants’, Michael Russin, Russin Financial, Russin Group, Simon Arias III, Arias Agencies, S. A. Holdings LLC Joinders to same and in support sets forth as follows:

1. Denied. It is specifically denied that Renee Zinsky entered into valid arbitration agreements with AIL that cover all claims brought against AIL in this action.
2. This is a reference paragraph referring to Declarations of Debra Gamble and Anne Dana attached as exhibits and the exhibits speak for themselves. To the extent a response is required, the allegations in paragraph 2 are denied. More specifically, said Declarations are irrelevant to the instant case since they completely fail to address the following:

- a. Renee Zinsky's claims for sexual assault, battery, false imprisonment, negligent infliction of emotional distress, and intentional infliction of emotional distress as set forth in her Amended Complaint;
- b. Renee Zinsky's claims for sex discrimination, sexual harassment, and retaliation which remain pending before the Equal Employment Opportunity Commission and the Pennsylvania Human Rights Commission; and,
- c. The newly enacted legal authority ending forced arbitration for workers who are victims of sexual assault and harassment, i.e. Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act of 2021.

WHEREFORE, it is respectfully requested that Defendant's Motion to Compel Arbitration and Stay the Case and Joinders to same be DENIED.

Date: June 29, 2022

Respectfully submitted,

/s/ Amy N. Williamson

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